

John Eddie Williams, Jr.  
Brian Abramson  
Margret Lecocke  
Walt Cubberly (SBN 325163)  
Batami Baskin  
Myles Shaw  
WILLIAM HART & BOUNDAS, LLP  
8441 Gulf Freeway, Suite 600  
Houston, Texas 77017-5051  
Telephone: (713) 230-2200  
Facsimile: (713) 643-6226  
Email: jwilliams@whlaw.com  
Email: babramson@whlaw.com  
Email: mlecocke@whlaw.com  
Email: wcubberly@whlaw.com  
Email: bbaskin@whlaw.com  
Email: mshaw@whlaw.com

*Attorneys for Plaintiffs*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case 3:23-md-03084-CRB

MDL No. 3084

Honorable Charles R. Breyer

**PLAINTIFFS' MEMORANDUM OF  
SUPPORT IN OPPOSITION TO  
DEFENDANTS' MOTION FOR ENTRY OF  
(1) ORDER TO SHOW CAUSE AND (2)  
CASE MANAGEMENT ORDER**

This Document Relates to:

Judge: Hon. Charles R. Breyer

Courtroom: 6 – 17th Floor

*WHB 504 v. Uber Technologies, Inc., et al.,  
No. 3:24-cv-05243*

*WHB 1425 v. Uber Technologies, Inc., et  
al., No. 3:24-cv-05129*

*WHB 644 v. Uber Technologies, Inc., et al.,  
No. 3:24-cv-05272*

*WHB 1549 v. Uber Technologies, Inc., et*

1 *al., No. 3:24-cv-05275*

2 *WHB 428 v. Uber Technologies, Inc., et al.,*  
3 *No. 3:24-cv-05236*

4 *WHB 703 v. Uber Technologies, Inc., et al.,*  
5 *No. 3:24-cv-05361*

6 *WHB 1661 v. Uber Technologies, Inc., et*  
7 *al., No. 3:24-cv-05468*

8 *WHB 1443 v. Uber Technologies, Inc., et*  
9 *al., No. 3:24-cv-05472*

10 *WHB 1930 v. Uber Technologies, Inc., et*  
11 *al., No. 3:24-cv-05555*

12 *WHB 1613 v. Uber Technologies, Inc., et*  
13 *al., No. 3:24-cv-05574*

14 *WHB 470 v. Uber Technologies, Inc., et al.,*  
15 *No. 3:24-cv-05440*

16 *WHB 1414 v. Uber Technologies, Inc., et*  
17 *al., No. 3:24-cv-05495*

18 *WHB 1468 v. Uber Technologies, Inc., et*  
19 *al., No. 3:24-cv-05500*

20 *WHB 1831 v. Uber Technologies, Inc., et*  
21 *al., No. 3:24-cv-05557*

22 *WHB 1860 v. Uber Technologies, Inc., et*  
23 *al., No. 3:24-cv-05568*

24 *WHB 1484 v. Uber Technologies, Inc., et*  
25 *al., No. 3:24-cv-05779*

26 *WHB 375 v. Uber Technologies, Inc., et al.,*  
27 *No. 3:24-cv-05781*

28 *WHB 1659 v. Uber Technologies, Inc., et*  
*al., No. 3:24-cv-05565*

*WHB 1273 v. Uber Technologies, Inc., et*  
*al., No. 3:24-cv-05950*

*WHB 1381 v. Uber Technologies, Inc., et*  
*al., No. 3:24-cv-05603*

*WHB 438 v. Uber Technologies, Inc., et al.,*  
*No. 3:24-cv-05631*

*WHB 349 v. Uber Technologies, Inc., et al.,*  
*No. 3:24-cv-05636*

1 *WHB 1334 v. Uber Technologies, Inc., et*  
2 *al., No. 3:24-cv-05624*

3 *WHB 1348 v. Uber Technologies, Inc., et*  
4 *al., No. 3:24-cv-05669*

5 *WHB 1611 v. Uber Technologies, Inc., et*  
6 *al., No. 3:24-cv-05665*

7 *WHB 1416 v. Uber Technologies, Inc., et*  
8 *al., No. 3:24-cv-05667*

9 *WHB 891 v. Uber Technologies, Inc., et al.,*  
10 *No. 3:24-cv-05666*

11 *WHB 1556 v. Uber Technologies, Inc., et*  
12 *al., No. 3:24-cv-05986*

13 *WHB 1057 v. Uber Technologies, Inc., et*  
14 *al., No. 3:24-cv-05715*

15 *WHB 1470 v. Uber Technologies, Inc., et*  
16 *al., No. 3:24-cv-05716*

17 *WHB 871 v. Uber Technologies, Inc., et al.,*  
18 *No. 3:24-cv-05770*

19 *WHB 1317 v. Uber Technologies, Inc., et*  
20 *al., No. 3:24-cv-05791*

21 *WHB 884 v. Uber Technologies, Inc., et al.,*  
22 *No. 3:24-cv-05948*

23 *WHB 2060 v. Uber Technologies, Inc., et*  
24 *al., No. 3:25-cv-01092*

25 *WHB 2064 v. Uber Technologies, Inc., et*  
26 *al., No. 3:25-cv-01101*

27 *WHB 2071 v. Uber Technologies, Inc., et*  
28 *al., No. 3:25-cv-01130*

*WHB 2075 v. Uber Technologies, Inc., et*  
*al., No. 3:25-cv-01148*

*WHB 2036 v. Uber Technologies, Inc., et*  
*al., No. 3:25-cv-01180*

*WHB 2042 v. Uber Technologies, Inc., et*  
*al., No. 3:25-cv-01206*

*WHB 2043 v. Uber Technologies, Inc., et*  
*al., No. 3:25-cv-01207*

1 *WHB 2044 v. Uber Technologies, Inc., et*  
2 *al., No. 3:25-cv-01209*

3 *WHB 2048 v. Uber Technologies, Inc., et*  
4 *al., No. 3:25-cv-01216*

5 *WHB 2051 v. Uber Technologies, Inc., et*  
6 *al., No. 3:25-cv-01226*

7 *WHB 2052 v. Uber Technologies, Inc., et*  
8 *al., No. 3:25-cv-01229*

9 *WHB 2053 v. Uber Technologies, Inc., et*  
10 *al., No. 3:25-cv-01237*

11 *WHB 2054 v. Uber Technologies, Inc., et*  
12 *al., No. 3:25-cv-01244*

13 *WHB 2056 v. Uber Technologies, Inc., et*  
14 *al., No. 3:25-cv-01246*

15 *WHB 2057 v. Uber Technologies, Inc., et*  
16 *al., No. 3:25-cv-01249*

17 *WHB 2059 v. Uber Technologies, Inc., et*  
18 *al., No. 3:25-cv-01255*

19 Uber moves to dismiss 37<sup>1</sup> Williams Hart & Boundas (WHB) Plaintiffs because it  
20 believes that these plaintiffs have provided “boilerplate” reasons as to why they were unable to  
21 submit the ride receipt related to the ride in which Uber’s driver assaulted them. To date, it is true  
22 that these Plaintiffs have not yet submitted a statement outside of their Uber Ride Information  
23 Form that explains in detail the reasonable efforts they have taken to search their emails and Uber  
24 apps for their ride receipts. None of the WHB Plaintiffs are accused of providing fraudulent or  
25 doctored ride receipts.

26 <sup>1</sup> There are 49 WHB Plaintiffs listed on Exhibit B to Uber’s Motion to Dismiss. Ten of these 49 plaintiffs have filed  
27 Notices of Dismissal Without Prejudice in the interim since Uber filed its motion. They are: WHB 1425; ID No.  
28 1868; WHB 1549, ID No. 1885; WHB 428, ID No. 1917; WHB 1443, ID No. 1959; WHB 1860, ID No. 2061; WHB  
1416, ID No. 2177; WHB 1317, ID No. 2199; WHB 2051, ID No. 2896; WHB 2052, ID No. 2898; WHB 2056, ID  
No. 2903. Two WHB plaintiffs, WHB 1831, ID No. 2058 and WHB 871, ID No. 2196, uploaded their ride receipt  
statements to MDL Centrality on December 5, 2025. See Exhibits A and B to Declaration of Walt Cubberly in  
Support of Plaintiffs’ Memorandum of Law in Opposition to Defendants’ Motion to Dismiss Cases for Failure to  
Comply with PTO 31 and Show-Cause Orders.

1 All 37 WHB Plaintiffs have provided Uber with the information in their possession about  
 2 the accountholder who ordered the ride so that Uber can identify the accounts at issue. All 37  
 3 WHB Plaintiffs have also provided Uber with the approximate date, starting, and ending locations  
 4 of the ride with as much precision as possible so that Uber can identify the rides at issue.  
 5 However, as noted, these 37 Plaintiffs to date have not submitted a statement outside of their  
 6 Uber Ride Information Form that explains in detail the reasonable efforts they have taken to  
 7 search their emails and Uber apps for their ride receipts, and therefore they are subject to  
 8 dismissal without prejudice under the terms of PTO 31.

9 Plaintiffs will point out that Uber's statement that these Plaintiffs have not meaningfully  
 10 participated in this litigation is unfair and inaccurate. Many of these 37 individuals have  
 11 submitted multiple verified Plaintiff Fact Sheets (*see e.g.*, WHB 1334, ID No. 2165; WHB 2071,  
 12 ID No. 2862; WHB 2053, ID No 2899; WHB 884, ID No. 2207). These Plaintiffs are not cavalier  
 13 in disobeying the Court's orders. They have attempted to keep up with Uber's deficiencies as well  
 14 as the requirements of this Court. Should the Court determine that these Plaintiffs' cases warrant  
 15 dismissal due to failure to provide the information required in PTO 31, Plaintiffs respectfully  
 16 submit that Uber's request to dismiss with prejudice be denied and that the dismissals be without  
 17 prejudice as set forth in PTO 31.

18 Finally, as discussed above, (see fn. 1) two plaintiffs, WHB 1831, ID No. 2058 and WHB  
 19 871, ID No. 2196, uploaded their ride receipt statements to MDL Centrality on December 5,  
 20 2025, and therefore respectfully should not be dismissed.

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 Dated: December 5, 2025

/s/ Walt Cubberly

John Eddie Williams, Jr.

Brian Abramson

Margret Lecocke

Walt Cubberly (SBN 325163)

Batami Baskin

Myles Shaw

WILLIAM HART & BOUNDAS, LLP

8441 Gulf Freeway, Suite 600

Houston, Texas 77017-5051

Telephone: (713) 230-2200

Facsimile: (713) 643-6226

Email: jwilliams@whlaw.com

Email: babramson@whlaw.com

Email: mlecocke@whlaw.com

Email: wcubberly@whlaw.com

Email: bbaskin@whlaw.com

Email: mshaw@whlaw.com

*Attorneys for Plaintiffs*